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Attorney for Claimants SONIA HUDSON
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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUNE 1, 2004

at 1 o'clock and 5 min. PM
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

In the Matter of

The Complaint of PETITIONER
LAHAINA PARASAIL, INC., a Hawaii
Corporation, regarding Motor Vessel
RED NORDIC, Official Number HA
1056 CP for exoneration from or
limitation liability,

Petitioner.

CIVIL NO. 04-00740 DAE/LEK
IN ADMIRALTY

**CLAIMANTS SONIA HUDSON AND
CASEY HUDSON'S ANSWER TO
PETITIONER LAHAINA PARASAIL
INC.'S COUNTERCLAIM;
CERTIFICATE OF SERVICE**

**CLAIMANTS SONIA HUDSON AND CASEY HUDSON'S ANSWER TO
PETITIONER LAHAINA PARASAIL INC.'S COUNTERCLAIM**

Comes Now Claimants SONIA HUDSON and CASEY HUDSON, by and through their undersigned counsel, and for answer to the Counterclaim of Petitioner LAHAINA PARASAIL, INC. herein states as follows:

1. Claimants admit the allegations contained in Paragraphs 1, 3, 4 and 7 of the Counterclaim.
2. Claimants deny the allegations contained in Paragraphs 8, 10, 11, and 12 of the Counterclaim.

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3. In response to Paragraph 2 of the Counterclaim, Claimants state that Mr. Lee was representing Claimants during the time period in which the Answer to the Complaint for Exoneration From or Limitation of Liability was filed.

4. In response to Paragraph 5 of the Counterclaim, Claimants admit that on August 1, 2005, the Court issued an order finding that Mr. Lee intentionally filed the Answer knowing that he was not admitted to practice before the courts of this district.

5. In response to Paragraph 6 of the Counterclaim, Claimants admit that on August 1, 2005, the Court issued an order finding that Mr. Lee engaged in the unauthorized practice of law in violation of Local Rules.

6. In response to Paragraph 9 of the Counterclaim, Claimants admit that Mr. Lee was acting as counsel on Claimants' behalf when he filed the Answer. However, Claimants were unaware that Mr. Lee was not authorized to practice before the courts of this district and therefore deny any agency relationship with respect to Mr. Lee's violation of the Local Rules.

FIRST DEFENSE

7. The Counterclaim fails to state a claim against Claimants.

SECOND DEFENSE

8. The Counterclaim is frivolous.

THIRD DEFENSE

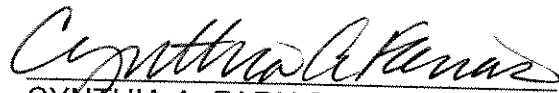
9. Petitioner and its attorneys have violated Rule 11, Federal Rules of Civil Procedure in that the Counterclaim is being presented for an improper purpose and the claims are not warranted by existing law.

FOURTH DEFENSE

10. The Court has already awarded sanctions against Claimants and Mr. Paul Lee for the unauthorized practice of law and, as such, the Counterclaim is moot.

WHEREFORE, Claimants SONIA HUDSON and CASEY HUDSON respectfully pray that the Court dismiss Petitioner LAHAINA PARASAIL INC.'s Counterclaim and that Claimants be awarded their attorneys fees and costs.

DATED: Honolulu, Hawaii, January 31, 2006.

A handwritten signature in black ink, appearing to read 'Cynthia A. Farias', is written over a horizontal line.

CYNTHIA A. FARIAS
Attorney for Claimants
SONIA HUDSON AND
CASEY HUDSON

FOR THE DISTRICT OF HAWAII

Petitioner.

CERTIFICATE OF SERVICE


CERTIFICATE OF SERVICE

was duly served on the following party(ies) at the address(es) indicated below via

() Hand Delivery (☒) U. S. Mail () Facsimile at _____ :

ROY Y. YEMPUKU, ESQ.
737 Bishop Street, Suite 2930
Honolulu, Hawaii 96813
Attorney for Petitioner
Lahaina Parasail, Inc.

DATED: Honolulu, Hawaii, 1/31/06


Cynthia A. Farias
Attorney for Claimants
SONIA HUDSON and CASE HUDSON